

STEPTOE & JOHNSON

ATTORNEYS AT LAW

1330 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036-1795

PHOENIX, ARIZONA
TWO RENAISSANCE SQUARE

TELEPHONE: (602) 257-5200
FACSIMILE: (602) 257-5299

(202) 429-3000

FACSIMILE: (202) 429-3902

TELEX: 89-2503

STEPTOE & JOHNSON INTERNATIONAL
AFFILIATE IN MOSCOW, RUSSIA

TELEPHONE: (011-7-501) 929-9700
FACSIMILE: (011-7-501) 929-9701

SARA BETH WATSON
(202) 429-6460

CONFIDENTIAL
FOR SETTLEMENT PURPOSES ONLY

August 31, 1995

VIA TELECOPY AND FIRST CLASS MAIL

Demaris Cristiano, Esq.
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency
Region 2
290 Broadway
New York, New York 10007

RECEIVED

SEP 05 1995

Re: SCP/Carlstadt De Micromis Settlement

Dear Ms. Cristiano:

As requested by EPA, enclosed is a chart showing the waste-in allocation, proposed settlement payment and premium payment for each PRP that has indicated it plans to participate in the settlement. The chart also shows, as an aggregate number, the alleged waste-in amount of all members of the Cooperating PRP Group, both settling and non-settling.

As I indicated in our telephone conversation today, fourteen additional parties, each of which allegedly has contributed less than 50,000 gallons to the site, have informed me that they are considering the settlement, but have not authorized me to release information to EPA at this time. Based on our discussion, I understand that these parties can participate in the settlement provided that they make their decision prior to the execution of the Consent Agreement. I will keep you advised regarding additional PRPs interested in joining the settlement.

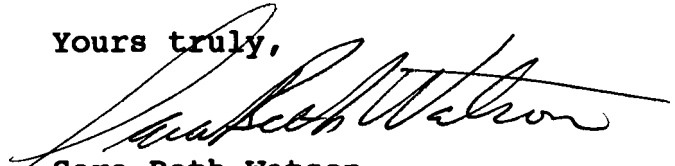
598958



Demaris Cristiano, Esq.
August 31, 1995
Page 2

If you have any questions regarding the attached,
please contact me at 202-429-6460.

Yours truly,

A handwritten signature in cursive script, appearing to read "Sara Beth Watson". The signature is written in dark ink and is positioned above the printed name.

Sara Beth Watson

cc: De Minimis Client Group
De Minimis Subcommittee of Cooperating PRP Group
William Warren, Esq. (Common Counsel Cooperating PRP Group)

**CONFIDENTIAL
FOR SETTLEMENT PURPOSES ONLY**

SCP/Carlstadt De Minimis Group Estimated Proposed Settlement Payments

	I	A	B <i>Base amount</i>	C	D
	Quantity Gallons	Percent of Total Quantity ^{1/}	Settlement costs. Total Quantity (\$)	Premium 100% of Column (A) (\$)	Total ^B ^C (A) + (B) (\$)
Chemical Dynamics (Schweizerhall)	1,483	0.005	4,686	4,686	9,372
Gaess Environmental & Recycling Industries	40,700 41,200	0.129	128,612	128,612	257,224
Georgia Pacific (X-Cel) <i>only sub site</i>	9,500	0.031	30,020	30,020	60,040
IBM Corporation	9,722	0.031	30,721	30,721	61,442
J.M. Huber	2,100	0.007	6,636	6,636	13,272
Kewanee Industries, Inc. <i>not in EPA work</i>	23,600	0.075	74,576	74,576	149,152
Kraft Foods, Inc., f/k/a Kraft General Foods	48,294	0.153	152,609	152,609	305,218
Owens-Illinois General, Inc.	1,380 1,085	0.003	3,428	3,428	6,856
Pacquet Oneida <i>(Oneida Products)</i>	4,200	0.013	13,272	13,272	26,544
Quality Chemicals, Inc.	10,300	0.03	32,548	32,548	65,096
Schenectady International, Inc.	32,799	0.104	103,644	103,644	207,288
Schering Corporation	9,600	0.031	30,336	30,336	60,672
Syntex Beauty	2,530	0.008	7,995	7,995	15,990
The Southland Corp.	2,500	0.008	7,900	7,900	15,800
Troy Chemical	4,500	0.014	14,220	14,220	28,440
Uniroyal Chemical Company	5,000	0.016	15,800	15,800	31,600
Westinghouse Electric Corp.	495	0.002	1,564	1,564	3,128
X Craft <i>(CPH CRAFT)</i>	8,580	0.024	27,112	27,112	54,224
Total	216,988	0.684			1,371,358

^{1/} Based on the alleged waste-in allocation of the Cooperating PRP Group of 31,274,872 gallons.